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9 Attorneys for Defendants  
10 AMERICAN SAFETY RISK RETENTION GROUP INC. and  
11 AMERICAN SAFETY INDEMNITY COMPANY

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 AIU INSURANCE COMPANY, a )  
16 New York corporation, )

17 Plaintiffs, )

18 vs. )

19 ACCEPTANCE INSURANCE )  
20 COMPANY, a Delaware corporation, )  
21 TIG INSURANCE COMPANY, a )  
22 California corporation, ARROWOOD )  
23 INDEMNITY COMPANY fka )  
24 ROYAL INDEMNITY COMPANY, )  
25 successor in interest to ROYAL )  
26 INSURANCE COMPANY OF )  
27 AMERICA, a Delaware corporation, )  
28 AMERICAN SAFETY RISK )  
RETENTION GROUP, a Vermont )  
corporation, AMERICAN SAFETY )  
INDEMNITY COMPANY, an )  
Oklahoma corporation, and, DOES 1 )  
through 10, inclusive, )

Defendants. )

Case No. C 07-5491 PJH

**STIPULATION AND [PROPOSED]  
ORDER RE CONTINUANCE OF  
CASE MANAGEMENT  
CONFERENCE**

Next CMC: August 21, 2008  
Courtroom: 3, 17<sup>th</sup> Floor  
Time: 2:30 P.M.  
Judge: Hon. Phyllis J. Hamilton

25 The parties hereto, Plaintiffs AIU INSURANCE COMPANY and all named  
26 Defendants (ACCEPTANCE INSURANCE COMPANY, TIG INSURANCE  
27  
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1 COMPANY, ARROWOOD INDEMNITY COMPANY fka ROYAL  
2 INDEMNITY COMPANY, successor in interest to ROYAL INSURANCE  
3 COMPANY OF AMERICA, AMERICAN SAFETY RISK RETENTION GROUP  
4 and AMERICAN SAFETY INDEMNITY COMPANY by and through their  
5 respective counsel of record, hereby stipulate and respectfully request that this  
6 Court continue the Case Management Conference currently set for August 21,  
7 2008, at 2:30 P.M. to September 11, 2008, at 2:30 P.M.:

8 GOOD CAUSE exists for the continuance of the Case Management  
9 Conference because:

- 10 1. Lead counsel for AMERICAN SAFETY RISK RETENTION  
11 GROUP, INC. and AMERICAN SAFETY INDEMNITY  
12 COMPANY will be unavailable based on scheduling commitments  
13 made well prior to the initial scheduling of the conference;
- 14 2. Preparation for and Attendance at a conference on August 21, 2007,  
15 for counsel for ACCEPTANCE INSURANCE COMPANY will be  
16 extremely difficult due to scheduling commitments made well prior to  
17 the initial scheduling of the conference; and
- 18 3. Out of respect for this Court and co-counsel, and so that the Case  
19 Management Conference can be as productive as possible, all counsel  
20 agree that it is in all parties' best interest to reschedule the Case  
21 Management Conference for a day where, as appropriate, all lead  
22 counsel for all parties can personally appear before this Court.

23 The parties stipulate and request that Court enter the following Order:

- 24 1. That the Case Management Conference currently set to take place on  
25 August 21, 2008, at 2:30 P.M. is off calendar;
- 26 2. A Case Management Conference shall take place on September 11,  
27 2008, at 2:30 P.M. and

1 3. Copies of the signatures to this Stipulation and related Order shall  
2 have the same effect and legal validity as the originals.

3  
4 IT IS SO STIPULATED:

5 DATED: August 11, 2008

MCCURDY & FULLER LLP

7  
8 By: 

LAURA J. RUETTGER  
Attorneys for Plaintiff  
AIU INSURANCE COMPANY

9  
10 DATED: August \_\_, 2008

LAW OFFICES OF SEMHA ALWAYA

11  
12 By: \_\_\_\_\_

SEMHA ALWAYA  
Attorneys for Defendant  
TIG INSURANCE COMPANY

13  
14 DATED: August 9, 2008 TRESSLER, SODERSTROM, MALONEY & PRIESS, LLP

15  
16 By: 

MARY E. MCPHERSON  
LINDA M. CORRIE  
Attorneys for Defendant  
ARROWOOD INDEMNITY COMPANY, F/K/A  
ROYAL INDEMNITY COMPANY, SUCCESSOR-  
IN-INTEREST TO ROYAL INSURANCE  
COMPANY OF AMERICA

17  
18  
19 DATED: August \_\_, 2008 MARRONE, ROBINSON, FREDERICK & FOSTER

20  
21 By: \_\_\_\_\_

THOMAS FOSTER  
Attorneys for Defendant  
ACCEPTANCE INSURANCE COMPANY

22  
23  
24  
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3. Copies of the signatures to this Stipulation and related Order shall have the same effect and legal validity as the originals.

IT IS SO STIPULATED:

DATED: August \_\_, 2008

MCCURDY & FULLER LLP

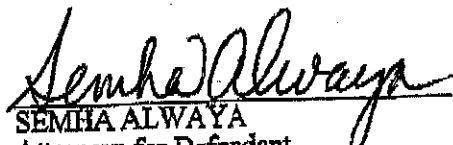
By:

LAURA J. RUETTIGERS  
Attorneys for Plaintiff  
AIU INSURANCE COMPANY

DATED: August 11, 2008

LAW OFFICES OF SEMHA ALWAYA

By:

  
SEMHA ALWAYA  
Attorneys for Defendant  
TIG INSURANCE COMPANY

DATED: August \_\_, 2008 TRESSLER, SODERSTROM, MALONEY & PRIESS, LLP

By:

MARY E. McPHERSON  
LINDA M. CORRIE  
Attorneys for Defendant  
ARROWOOD INDEMNITY COMPANY, F/K/A  
ROYAL INDEMNITY COMPANY, SUCCESSOR-  
IN-INTEREST TO ROYAL INSURANCE  
COMPANY OF AMERICA

DATED: August \_\_, 2008 MARRONE, ROBINSON, FREDERICK & FOSTER

By:

THOMAS FOSTER  
Attorneys for Defendant  
ACCEPTANCE INSURANCE COMPANY

///

1 3. Copies of the signatures to this Stipulation and related Order shall  
2 have the same effect and legal validity as the originals.

3  
4 IT IS SO STIPULATED:

5  
6 DATED: August \_\_, 2008

MCCURDY & FULLER LLP

7  
8 By:

LAURA J. RUETTIGERS  
Attorneys for Plaintiff  
AIU INSURANCE COMPANY

9  
10 DATED: August \_\_, 2008

LAW OFFICES OF SEMHA ALWAYA

11  
12 By:

SEMHA ALWAYA  
Attorneys for Defendant  
TIG INSURANCE COMPANY

13  
14  
15 DATED: August \_\_, 2008 TRESSLER, SODERSTROM, MALONEY & PRIESS, LLP

16  
17 By:

MARY E. McPHERSON  
LINDA M. CORRIE  
Attorneys for Defendant  
ARROWOOD INDEMNITY COMPANY, F/K/A  
ROYAL INDEMNITY COMPANY, SUCCESSOR-  
IN-INTEREST TO ROYAL INSURANCE  
COMPANY OF AMERICA

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19  
20  
21 DATED: August 11, 2008 MARRONE, ROBINSON, FREDERICK & FOSTER

22  
23 By:

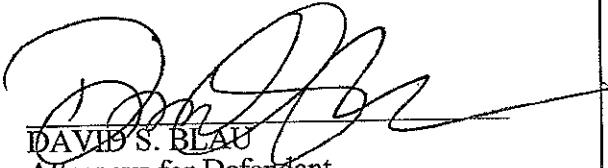
  
THOMAS FOSTER  
Attorneys for Defendant  
ACCEPTANCE INSURANCE COMPANY

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1 DATED: August 8, 2008

LAW OFFICES OF DAVID S. BLAU

2  
3  
4 By:

  
DAVID S. BLAU  
Attorneys for Defendant  
AMERICAN SAFETY RISK RETENTION  
GROUP, INC., AMERICAN SAFETY  
INDEMNITY COMPANY

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7  
8 **[PROPOSED] ORDER**

9 Having reviewed and considered the foregoing Stipulation of the parties,  
10 and good cause appearing for the same,

11 IT IS SO ORDERED:

- 12 1. That the Case Management Conference currently set to take place on  
13 August 21, 2008, at 2:30 P.M. is off calendar;  
14 2. A Case Management Conference shall take place on September 11,  
15 2008, at 2:30 P.M., in Courtroom 3, 17<sup>th</sup> Floor, of this court; and  
16 3. Copies of the signatures to this Stipulation and related Order shall  
17 have the same effect and legal validity as the originals.  
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20 Dated: \_\_\_\_\_

21 JUDGE OF THE DISTRICT COURT  
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